

**GISKAN SOLOTAROFF & ANDERSON LLP**  
Attorneys at Law

February 26, 2020

**BY ECF**

Hon. Paul A Engelmayer  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re:    *Johnson v. Construction Realty Services Group, Inc., and Trade Off, LLC***  
**Case No.: 18-cv-09347 (PAE)**

Dear Judge Engelmayer:

My firm represents Plaintiff Javashia Johnson in the above-referenced matter. I write on behalf of both parties to provide the Court with a status update as well as request that the Court extend the date for the parties to inform the Court of a settlement from Friday, February 28, 2020 until Friday, March 6, 2020.

First, the parties apologize for neglecting to provide the Court with a status report by December 13, 2019 as required by the Court's October 11, 2019 order. The parties have been engaged in global settlement discussions during this period in an attempt to resolve this case, other cases in which I represent Trade Off employees, as well as a New York State Attorney General investigation.

During these discussions, in late November 2019, I learned from Ms. Johnson's family the extremely unfortunate news that Ms. Johnson had died after becoming seriously ill earlier in the year. I informed Defendants of Ms. Johnson's death and we agreed to continue attempting to resolve her case as part of the global resolution. After determining that Ms. Johnson's case was still viable because of the anticipated testimony of other witnesses, I also started working with Ms. Johnson's mother to have her appointed as the Administrator of Ms. Johnson's estate so she could be substituted as the plaintiff in this action.

Meanwhile, the global settlement discussions proceeded to a mediation on Monday February 24, 2020 before Christopher Kwok at JAMS that I attended along with Trade Off's counsel and counsel from the Attorney General's Office. While a global settlement was not reached, significant progress was made and a final resolution may be reached by the end of this week or early next week. Accordingly, I request a brief adjournment of the February 28, 2020 deadline to inform the Court of a settlement in the hope that that the parties can inform the Court

of a settlement in the next several days. I again apologize for not keeping the Court more up to date on the status of the action.

Sincerely yours,

/s

Jason L. Solotaroff

cc: Lisa Skruck, Esq.  
Counsel for Defendants